

Testimony of Dr. J. Lee Alley, president Alabama Cattlemen's Association

Country of Origin Labeling Informational Session

Held by Agricultural Marketing Service U. S. Department of Agriculture

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Good afternoon, my name is Lee Alley and I currently serve as president of the Alabama Cattlemen's Association. I grew up on our family's cattle farm in east Alabama and have spent over 40 years as a cattle producer and as an employee in the animal health industry. I recently retired from 22 years of service as Alabama State Veterinarian where I worked directly with cattle producers at the local, state, national and international levels. During my tenure as State Veterinarian, we successfully eradicated tuberculosis and, through much hard work, our state obtained the "Brucellosis Free" status. We have had a great deal of experience with identifying and tracing cattle.

The Alabama Cattlemen's Association represents 12,600 members and the state's cattle industry. Our cattle producers sell nearly \$500 million worth of cows and calves each year. Most of our 20,000+ producers are small part-time cow/calf operators and their first point of sale is typically the local auction market. Virtually all of our calves are shipped at weaning to the mid-west and west for further finishing.

The Alabama Cattlemen's Association board of directors voted last July to support mandatory Country of Origin Labeling (COOL). Our association appreciates this opportunity today to meet with policy makers and discuss ways to insure that country of origin labeling, as implemented by USDA, is one that will benefit our cattle producers. It is critical that the paperwork and costs be minimized. We need to use existing records and information whenever possible.

The overall impact of COOL must be carefully evaluated. The current dialogue and information exchange occurring between the beef industry and USDA must be fully evaluated before mandatory implementation of COOL occurs.

We have concerns about the exclusion of some products, such as poultry, and the foodservice segment of our industry. We also have great concerns about the estimated cost ranging in the billions of dollars to implement COOL. Costs of this magnitude would be devastating to an industry that operates on small margins.

We also have grave concerns about mandated use of third party certification (this will be one of the most costly items) at the farm level. There are numerous programs operating successfully today in the beef industry that use an affidavit to verify origin. These models include the Quality Grade Certification System, Certified Angus Beef, the National School Lunch program, Hazard Analysis and Critical Control Point regulations and the Market Access Program.

We encourage the secretary to work diligently to develop a simple method of self-certification for the cow/calf producer. A signed affidavit certifying origin at the first point of sale should be sufficient. After all, this is "country" of origin not "herd" of origin. Then any movements from this "U. S. herd" could be verified on papers that normally accompany the movement of cattle such as bills of sale, permits, health papers and other approved documents.

Currently there is a national effort underway to develop a standardized animal identification (ID) program. The current Canadian BSE problem, which has cost their beef industry over \$20 million per day, certainly amplifies the need for the U. S. to have an animal trace back system. Animal identification is becoming even more critical in protecting animal and human health, assuring food safety and

homeland security. I support these efforts for the development of a national animal ID program.

The USDA along with the FDA, and the Department of Homeland Security should work together to develop funding for the implementation of a national animal ID program. It's in the nation's "best interest" to provide the technology to producers that would provide a trace back system insuring the safety and protection of our nation's food supply. We suggest that funding be made available through state cattlemen's associations to handle the animal ID program. If this was accomplished first, COOL would be much simpler to implement.

It is critical that the time frame for implementing the mandatory program is sufficient to allow for proper producer education on the required regulations prior to the birth of any calves that fall into the system. Since the timetable has already passed for this year's calf crop, (it takes on the average eighteen months from birth through the feedlot for cattle) we would suggest that USDA delay implementing the mandatory program for at least one year. If this does not occur, we would respectfully request that cattle born prior to the final rule on the procedures be grandfathered into the program.

In closing, I would reiterate that the goal of the Alabama Cattlemen's Association is to work with you in developing COOL in such a manner that the implementation will not be burdensome or costly to our cattle producers and would be beneficial to both the producer and the consumer.

Thank you.